DOCUMENT RESUME

ED 236 616 CS 207 738

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TITLE Social and Economic Perspectives in Current Communications Policymaking.
PUB DATE Aug 83
NOTE 21p.; Paper presented at the Annual Meeting of the Association for Education in Journalism and Mass Communication (66th, Corvallis, OR, August 6-9, 1983).
PUB TYPE Information Analyses (070) -- Speeches/Conference Papers (150)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS Cable Television; *Competition; *Government Role; Information Dissemination; Information Sources; Mass Media; *Policy Formation; Rhetoric; Rhetorical Criticism; *Telecommunications
IDENTIFIERS *Deregulation; Media Ownership; *Public Interest

ABSTRACT

Arguing that serious students of telecommunications policy must consider the impact that government deregulation will have on virtually every aspect of communications policymaking, this paper examines two goals that deregulators have deemed essential: convincing regulators that the marketplace is synonomous with public interest, and demonstrating that the marketplace is sufficiently competitive to warrant extensive deregulation. Among the topics considered in the paper are the following: (1) the rhetoric of deregulation, (2) the history of government regulation, (3) the economics of deregulation, (4) competition in the telecommunications area, (5) cross-media ownership, (6) the growth of cable television, (7) efforts of broadcasters to reduce competition, and (8) the relationship of government to business. The paper concludes with a list of questions about deregulation and a warning that the biggest threat to public policy lies in the confusion of the marketplace with the historic principle of the public interest. (FL)

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COMMITTEE ON COMMUNICATIONS
TECHNOLOGY AND POLICY

SOCIAL AND ECONOMIC PERSPECTIVES IN CURRENT COMMUNICATIONS POLICYMAKING

by

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Presented to the Association for Education in Journalism and Mass Communication Annual Convention, August 6-9, 1983, Corvallis, OR.

CS 207738

No serious student of contemporary telecommunications policy can afford to overlook the impact of deregulation on virtually every aspect of communications policymaking. The players, the issues, and the arena have been captured, so to speak, by the language and force of the marketplace argument. The terminology associated with the technology is of crucial importance because the set of meanings derived from the terminology functions to set the telecommunications policymaking agenda. An examination of these "new emerging terminologies" may shed some light on the qualitative effects such usage has on the policy process.

For almost two decades, communications scholars, government policymakers and industry professionals have been alluding to the "new communications technologies." The rise of these new technologies has resulted in a concomitant legislative drive to revise federal law. Accompanying these developments is a rhetoric that seems to have redefined the terms by which communications policy is made. For example, such notions as marketplace forces, competition, deregulation, freedom of expression, and the public interest, for many, seem to be closely intertwined, perhaps inseparable.

The growth of new communications distribution and delivery systems have significant economic, legal, political, and social consequences. Recognition of these concerns has resulted in

renewed calls for a comprehensive, national telecommunications policy. For the deregulators, it is essential that two goals be accomplished: 1) convince the regulators that the marketplace is synonomous with the public interest and concurrently 2) demonstrate that the marketplace is sufficiently competitive to warrant extensive deregulation. This essay offers a current perspective on these two goals.

Most of the policy debate centers on how government should respond to the exploding information environment. The language associated with the debate contrasts the notions of marketplace forces (read competition) and the public trusteeship model based on a limited spectrum theory. The imagery cast up by these terms contains strong emotional appeals.

FCC Commissioner Joseph Fogarty's comments in the agency's 1981 Radio Deregulation decision illustrate some of the confusion associated with new marketplace theories:

> There is a pervasive and troubling circularity in much, if not all, of the proferred economic justification for complete deregulation; i.e., the marketplace will best serve the public interest because the public interest is best served by the marketplace; or otherwise stated, whatever programming is produced by the marketplace is by definition in the public interest (84 FCC 2d 968 <1981>).

There seems to be a presumption of rationality and fairness to the idea of "competition in the marketplace." This terminology easily merges with "the marketplace of ideas and freedom of

expression." It has long been an article of faith among many broadcasters and more recently that of FCC Chairman Mark Fowler that the "public interest" standard is a euphemism for what interests the public (5). In this way, as Fogarty indicates, the public interest becomes interchangeable with the marketplace. The marketplace is where choices are made and what better place for the public to be served. The methodology for accomplishing these ends is called deregulation. However, its origins are almost a century old.

Beginning with the Act to Regulate Commerce (1887) establishing federal jurisdiction over interstate railroad rates, regulatory agencies have set prices and services for many sectors of the business and industrial community. With the expansion of regulation came the demand for regulatory reform. However, "proposals for reform have gone beyond simply making corrections in agency procedure." Legislation has been introduced to change, reorganize and reduce existing regulation (12).

The growth of regulation probably peaked in the sixties and seventies with what Wilson describes as "entrepreneurial politics." The surge of consumer, environmental, civil rights, and health and safety standards were primarily the result of the "efforts of a skilled entrepreneur who can mobilize latent public sentiment, . . . put the opponents . . . on the defensive . . . and associate the legislation with widely shared values (19).

The implementation of new and progressive legislation also functioned to wake a sleeping giant, the business community. Growing increasingly sensitive to the encroachments by government

and fearful of the expanding economic distress of the latter seventies, a revolt against regulation began to take shape. Of equal importance, says former Federal Trade Commission (FTC) Chairman Michael Pertschuk, was "the extraordinary mobilization of business for political action that took place following the 1974 congressional elections, . . . the emerging dominance of the media campaign and Congressional dependency . . . on corporate PACs." Finally, he details how the emergence of a revitalized FTC became the personification of the evils of big government and oppressive regulation for the private sector (15).

The movewment toward deregulation is not wholly a response to the nature of the American political system. Deregulation also owes its thrust to the burgeoning nature of the technology of telecommunications. As improvements were made in the capacity of multi-channel systems, their obvious benefits increasingly came to the attention of segments of the business, government and academic communities. As the potential of these systems crept into the public imagination, it soon became apparent that the telecommunications enterprise was vast in scope and promise.

As awareness increased, so did the competition for the mega-billions to be made (and lost) in the pursuit of what some have described as the last great Gold Rush of the 20th century (17). No company, no government, virtually no societal institution, it was claimed, could cope, much less survive, without entering into the information age which presumes the technological convergence associated with the marriage of computers and communications in all its attendant applications.

The mounting concern about the role of new communications technology and policy soon became a priority interest of the people who make the rules, particularly the FCC and the Congress, ready targets for those who wished to impose their vision on what tomorrow should look like. The picture most frequently drawn was one of new competition, new abundance, new freedom, new policy and, of course, new interpretations of the law (3). In order to command this part of the scenario, a new communications rhetoric became a central part of the policy process.

Soon, strong rumblings were heard in the land for a substitute theory of government regulation. The introduction of new technology was equated with new forms of competition. The most vulnerable regulatory regime was the limited spectrum proposition. As the historic basis for broadcast regulation, it became the focal point for sustained attack by broadcasters. It was claimed that physical facilities were no longer scarce, which, if true, meant that large portions of the 1934 Federal Communications Act (FCA) were obsolete.

The issue turns on the question of whether scarcity is an economic question or if there is a physical shortage of spectrum space. Unfortunately, there is no common agreement on what is the best measure of scarcity. Most broadcasters are convinced that the main obstacle to entry is lack of financing; FCC Chairman Mark Fowler agrees (6). The evidence most frequently cited is the wide availability of radio stations plus the increasing number of video choices. Given these circumstances and the denial of full First Amendment rights, the perception by the industry is

one of government interference causing a chilling effect on the broadcasters' freedom of expression (1).

An alternative explanation however, was provided by the FCC in its Report on Editorializing (13 FCC 1246, Fairness Doctrine <1949>), reiterated by the Supreme Court in its Red Lion decision and noted again by the Commission in its 1974 Fairness Report (39 FR 26373): "This scarcity principle is not predicated upon a comparison of the number of broadcast stations and the number of daily newspapers in a given market. The true measure of scarcity is in terms of the number of persons who wish to broadcast and there are still 'substantially more individuals who want to broadcast than there are frequencies to allocate.'"

This position is closely linked to the idea of an affirmative interpretation of the First Amendment. An interlocking relationship has been developed by the Supreme Court in three central decisions. In NBC v. U.S. (319 U.S. 190 <1943>), the Court legitimized FCC oversight of broadcast programming in the public interest, using the limited spectrum notion as the basis for its decision. In AP v. U.S. (326 U.S. 1 <1945>), the Court endorsed a powerful concept: private interests must give way when access to diverse sources of information is threatened. In Red Lion Broadcasting Co. v. FCC (395 U.S. 367 <1969>), the Court pulled these notions together in stating that First Amendment interests are best served wherein the public's rights are paramount to those of the broadcaster operating in a medium not open to all.

And it has not gone unnoticed that a large portion of a station's fair market value represents the value of the spectrum for

which the seller paid nothing. In major markets, prices far outrank the value of real property and facilities. Fair market value is computed on the basis of return on investment and this value significantly outstrips that of the physical plant. The over $200 million recently paid for TV stations in Boston and Los Angeles tends to support the view that there is substantial demand for limited spectrum resources.

One observer has remarked that the changing telecommunications environment does not necessarily ensure the kind of diversity that results from true competition. Numerical increases in players and/or services are not always accurate measures of content diversity. The increase and variety of telecommunications outlets serve only to mask the real state of the art: the distinctiveness characterized by broadcast versions of McDonald's and Burger King restaurants offering "pre-packaged, nationally distributed items." He questions whether "in our anticipation of this impressive array of new delivery devices, we are once again making the mistake of equating channels with content" (9).

Rowland, after a lengthy analysis of the communications policy process, concludes:

> To the extent deregulation fosters more competition only among large, national, profit-driven, corporate interests, it represents a relatively small group of actors with a notably narrow range of purposes, a communications process that is still highly centralized and unidirectional, and a rather shallow level of cultural and political experience (16).

This "small group of actors" is also making its mark in reshaping structural arrangements. There is a steady increase in cross-media affiliation that tends to narrow the very diversity and competition that supposedly forms the basis for deregulation. This interesting paradox is manifested in the growing interrelationship of information enterprises with non-media entities. Barnouw describes how some of the most powerful media (networks and large group owners) "are all deeply involved in other businesses."

> The involvements include weapons production, aerospace manufacture, atomic energy, radar, newspaper publishing, book publishing, cable television, theaters, amusement parks, toy manufacture, medical equipment, medical textbooks, soft drink bottling plants, vending machines, mobile homes, real estate. . . . The symbiotic growth of American television and global enterprise has made them so interrelated that they cannot be thought of as separate (2).

The burgeoning cable TV industry also has attracted a great deal of attention from a plethora of interests including such media giants as Time, Inc., Times-Mirror, Knight Ridder, The New York Times, and Harte-Hanks, also Westinghouse, General Electric, Getty Oil and American Express among others. As the channel capacity increases, so does the concentration of control.

The most significant development with respect to increased competition is the rapid wiring of the nation by cable television companies. At present, roughly 34 per cent of all television

households receive basic cable service, however cable passes 60 per cent of all TV households. Thus, only 57 per cent of those homes with the option to subscribe to CATV have chosen to take the service (and of that 57 per cent, only another 57 per cent subscribe to pay cable). The FCC indicates an even lower passby rate in its assessment of long-term prospects for competition between cable and broadcast TV: "even if every household in the top 100 markets (which account for over 85 percent of all TV households) had access to cable--that is, 100 percent passby--less than 40 percent of all households . . . would actually subscribe." The Commission concludes that "even with an unlimited number of distant signals being imported into a market, nationwide cable penetration would not exceed 48 percent. This projection includes the growth impact of pay cable and other non-broadcast services as well. The Commission also filed supporting data from ABC which stated that "'the enormous cost of wiring the nation . . . casts doubt upon the achievement of even the 48 percent penetration level projected in the Economic Inquiry Report'" (18, p. 363-364).

Other data on the size of the cable TV industry is also suggestive of its relative small size compared to broadcast TV. The largest cable company (Tele-Communications, Inc.) estimates its subscriber count at approximately 2 1/4 million. Only one other multiple system operator (MSO) has more than two million subcribers. Home Box Office, the nation's largest pay cable operator lists 11.5 million subscribers. No other pay service has more than five million subscribers (see "Cable Stats" in

Cablevision, May 16, 23, 1983). Broadcast television, nationally and in the top 50 markets, dwarfs most cable penetration levels in terms of audience potential, size and set penetration. What do these figures mean? Quite possibly that policies directed toward deregulation based on new competitive media may be premature.

Further evidence of the lack of current marketplace competition is the recent Malrite decision (Malrite TV of New York v. FCC, 652 F.2d 1140 <2d Cir. 1981>) which upheld the FCC's waiver of the distant signal and syndicated exclusivity rules. The waiver was based on the failure of the broadcasting industry to demonstrate economic harm with respect to the importation of distant signals or the duplication of syndicated programs in a local television market. These data plus trade press reports showing no significant diminution of network or station profits indicate that the cable industry has made little lasting impression on the bottom line of radio and television station owners.

Competition from cable television is not the only source of concern to broadcasters, however. The FCC's authorization of low power television (LPTV), direct broadcast satellite service (DBS), the growth of subscription television (STV), multipoint distribution service (MDS), and the increasing size of the home video market which fragments viewing choices also threaten the broadcasters' bottom line. However, the evidence seems quite clear that at this time there are not enough LPTV licensees to gauge the threat of this medium. DBS is in a similar stage of growth, but seems destined to provide service to underserved

areas rather than large urban markets. STV and MDS may have only limited economic viability given the closing window of cable growth. Home video may ultimately present the greatest threat to broadcast television, but that ecomonic harm has yet to be demonstrated.

Compaine offers a useful perspective:

> First, the impact of new technology on society comes about through its adoption, not by the mere fact of its creation. Second, technological change takes place through a rather orderly and predictable series of steps. Finally these steps take time. Thus, major change casts a long shadow before it, allowing those who have followed the process with some attentiveness to make appropriate adaptive responses (18, p. 308).

Despite the clamor to be rid of onerous governmental controls, frequently, industry strongly opposes deregulation. For instance, the trucking industry and the trucking unions were outraged by President Ford's trucking proposals. The American Trucking Association insisted that "America's surface freight transportation system, the finest man has ever devised, is under attack." The Teamsters called it "the most destructive legislative proposal in the last 40 years." What labor and management feared was more competition in the marketplace (13).

The National Association of Broadcasters (NAB) apparently shares that script with the trucking association. On more than one occasion, the NAB has made the claim that regulation was desirable and the FCA should be retained (11). Rhetorically, all

parties favor private free enterprise competitive capitalistism. But, in reality, each strongly lobbies for reduced competition and/or protection from new competitors. All continue to seek, as the Washington legal fraternity describes it, "a fair advantage."

Examples of these fixed economic positions include: 1) broadcasters' insistence on the maintenance of the must-carry rules for protection from "unfair" competition from cable operators; 2) the continuing fight to bury the FCC's proposal for additional VHF drop-ins, which would provide unwanted competition (the industry's defense is couched in signal interference terms); 3) resistance to adding more FM stations to the Table of Assignments on similar grounds although again the fear is increased competition; 4) the successful lobby campaign that killed the 9 KHz bandwidth reduction plan that would have provided more competition by increasing the number of AM stations; and 5) the on-going industry campaign to scuttle the FCC's authorization of direct broadcast satellite service (DBS). Broadcasters allege that any communications service using spectrum that provides programming bypassing local stations, such as DBS, must be resisted. Broadcasters believe that "local service" will be destroyed despite the fact that relatively little programming is of local origin. "Yet the NAB admits that use of direct broadcast satellite delivery may be one of the prime ways to increase prospects for competitive entry into networking" (18, p. 385).

These are only the most recent examples of broadcasters' efforts to reduce competition. Earlier massive industry campaigns to restrain the growth of cable and subscription television are

well-documented.

The ironic twist to these contradictory marketplace orientations by broadcasters is the current dissatisfaction with the FCC's marketplace decisions on AM stereo and the stripping of teletext from cable carriage of broadcast signals. In these latter instances, broadcasters have been loathe to accept the present Commission's philosophy of letting the marketplace determine which AM stereo service will serve the public best. At the same time, television broadcasters question the FCC's concern for the new teletext technology when the Commission refuses to intervene and mandate that cable systems carry teletext signals from local TV stations that must be carried.

Industry rhetoric for marketplace competition is operative chiefly when there are clear economic benefits to be gained. Where profits are threatened, a new vocabulary is introduced, the rhetorical ground is shifted, generally, to the evils of government interference or First Amendment issues, such as the stifling of freedom of expression.

For example, the cable TV industry has argued that CATV operators are "electronic publishers" and therefore entitled to full First Amendment rights similar to print (see unpublished NCTA paper by Robert Ross, "Cable Television, Government Regulation, and the First Amendment," April 1981). However, when it is suggested that cable operators surrender some of their channel capacity for other potential users, the industry resists. When it is suggested that telephone companies be allowed to provide cable TV kinds of services, system operators quickly plead unfair

competition. When system or channel ownership restrictions are proposed, government intervention is charged. When new players enter the marketplace, government intervention is sought. At Bottom, profit-maximization is the goal through whatever linguistic technique will achieve that end. These rhetorical tactics function as strategies to manage the regulatory environment and provide industry stability.

An excellent example of the uncertainty associated with the marketplace model is the policy debate over the FCC's financial interest rules. The rules state that the networks may not have a financial interest in those companies that develop program product for sale to the networks. A related rule prevents the networks from being in the domestic syndication business. The rules were imposed to create more diversity in the program schedules of local TV affiliates by forcing stations to seek out non-network programming. The results of these rules have been mixed at best.

As more new players, such as HBO and Showtime, entered the marketplace, the networks claimed that in order to compete "on a level playing field," the rules should be abandoned. However, the NAB has testified that "although there are many independent suppliers of programming to networks, the fact remains that there are only three buyers of network programs," resulting in an obvious reduction in "competition and diversity in the supply of video programming to the public" (18, p. 286).

The problem is that many of the major producers, distributors, and users of syndicated product, the motion picture studios,

independent production companies, and independent television stations vigorously oppose the networks' re-entry into the domestic syndication marketplace. Interestingly enough, both sides claim the other's position is anti-competitive. Of course, all participants insist that they are acting in the public interest.

Regardless of one's views with respect to the values residing in the philosophical notions of deregulation, it is a movement that has captured both government and industry. Under the circumstances, it is particularly ironic that the 50-year broadcast regulatory experience has shown itself to be a sham, a myth. As many commentators have noted throughout the FCC's checkered history, the Commission has all too often ignored its own standards. The evidence would seem to suggest that we now have a deregulatory myth. As Head suggests, the FCC's position seems to be that if the rules cannot or should not, be enforced, change the rules" (7).

What are the most important factors that account for the degree of deregulatory success achieved to date? Owen and Braeutigam claim that broadcasting is almost unique among regulated industries, since many politicians believe, rightly or wrongly, that television has an important effect on political fortunes" (14). First Amendment scholar Thomas Emerson is more specific: "In 1966 . . . about a half of the members of Congress were members of law firms that represented broadcasters" (4).

This telecommunications connection illustrates a fundamental principle in American political life. Lindblom has noted that ultimately, the success of democratic government is symbiotically

linked with business. The former serves primarily to promote a healthy market economy. This relationship has given business a "privileged" position that virtually no other sector in our society enjoys. "To induce business managers to perform, governments must give them everything . . . they need for sufficiently profitable operation. Policy making . . . comes under a special control by business. . . . Governments award to business . . . a privileged position in the play of power in policy making." An important aspect of the policy process "consists of arrangements allowing business people to share in policymaking explicitly and directly (10).

Another critical factor that must be considered is the expanding judicial acceptance of marketplace principles. The Supreme Court has given its imprimatur to that concept in the format change cases (FCC v. WNCN Listeners Guild, 450 U.S. 582, <1981>) followed by the recent appeals court decision (Office of Communication of the United Church of Christ v. FCC, 53 RR 2d 1371 <US App DC, 1983>) upholding the FCC's 1981 radio deregulation order (84 FCC 2d 968 <1981>).

These events suggest that there is nothing faddish about

1. Cf., It is a mistake to draw sharp distinctions "between government and market. . . . Government creates the market by defining the terms and boundaries for business activity guided by public perceptions of governmental responsibility for the overall health of the economy. . . . Public and private spheres are becoming indistinguishable" (5). Further, "American statesmanship must rise above the myth of the unmanaged market. . . . It must devote itself instead to helping our citizens perceive the consequences of public choices about economic change and to hold accountable those who make these choices" (275). The thrust of this argument is that "social justice is not incompatible with economic growth, but is essential to it" (18-21). Robert Reich, The Next American Frontier. New York: Times Books, 1983.

deregulation. However, some questions remain unanswered: 1) is this the most appropriate time to remove the regulatory machinery if we are entering a rapidly changing technological environment? 2) what will be the criteria for determining marketplace failure? and 3) how are social needs to be met when the major criteria for entrance into and operation of the electronic media are marketplace considerations? The most ominous threat to public policy however, may very well be the blurring of the meaning of the marketplace and the historic bedrock principle of the public interest[2](8).

2. In 1982 the NAB began a campaign to convince its membership that "the public owns the airwaves . . . and if you believe that, we would like to sell you the Brooklyn Bridge. The shibboleth that the public owns the airwaves has been repeated so often that many legislators, judges and members of the public actually believe the notion has some merit." unpublished paper, NAB, February 1982, p. 1.

REFERENCES

1. Althouse, Ann. "Broadcast Deregulation and the First Amendment: Restraints on Private Control of the Publicly Owned Forum," New York University Law Review 55, June 1980, pp. 517-543.

2. Barnouw, Erik. The Sponsor. New York: Oxford University Press, 1978, p. 158.

3. Campbell, Angela. "The FCC's Proposal to Deregulate Radio: Is It Permissible Under the Communications Act of 1934?" Federal Communications Law Journal (32)2, Spring 1980, pp. 233-268.

4. Emerson, Thomas I. The System of Freedom of Expression. New York: Random House, 1970, p. 628.

5. Fowler, Mark. "The Public's Interest," Communications and the Law 4(1), Winter 1982, pp. 51-58.

6. Fowler, Mark and Daniel Brenner. "A Marketplace Approach to Broadcast Regulation," Texas Law Review 60, 1982, pp. 207-257.

7. Head, Sydney. Broadcasting in America. (4th ed.) Boston: Houghton Mifflin Co., 1982, pp. 459-460.

8. Kokalis, Peter J. "'Updating' the Communications Act: New Electronics, Old Economics, and the Demise of the Public Interest," Comm/Ent Law Journal (3)3, 1981, pp. 455-501.

9. Le Duc, Don R. "Deregulation and the Dream of Diversity," Journal of Communication (32)4, Autumn 1982, pp. 169-171.

10. Lindblom, Charles E. The Policy-Making Process. (2nd ed.) Englewood Cliffs, N.J.: Prentice-Hall, Inc., 1980, pp. 74-75.

11. Lucoff, Manny. "The Rise and Fall of the Third Rewrite," Journal of Communication (30)3, Summer 1980, pp. 47-48.

12. MacAvoy Paul W., The Regulated Industries and the Economy. New York: W. W. Norton & Co., 1979, pp. 14-15.

13. Mitnick, Bernard. The Politcal Economy of Regulation. New York: Columbia University Press, 1980, p. 470.

14. Owen, Bruce M. and Ronald Braeutigam. The Regulation Game. Cambridge, Mass.: Ballinger Publishing co., 1978, p. 147.

15. Pertschuk, Michael. Revolt Against Regulation. Berkeley, Cal.: University of California Press, 1982, pp. 50-62.

16. Rowland, Willard. "The Process of Reification: Recent Trends in Communications Legislation and Policy-Making," Journal of Communication (32)4, Autumn 1982, p. 133.

17. "Special Report: Prospecting for Cable Franchises--The Gold Rush of 1980," Broadcasting, March 31, 1980, p. 34.

18. U.S. Congress, House of Representatives, 97th Cong. 1st Sess. Committee on Energy and Commerce, Subcommittee on Telecommunications, Consumer Protection, and Finance. Telecommunications in Transition: The Status of Competition in the Telecommunications Industry. Majority Staff Report, November 3, 1981.

19. Wilson, James Q. ed., The Politics of Regulation. New York: Basic Books, 1980, p. 370.